

# **ATTACHMENT # B**

**UNITED STATES FEDERAL COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

Plaintiff,  
v.

SEAN COMBS,  
JUSTIN DIOR COMBS,  
ETHIOPIA HABTEMARIAM,  
LUCIAN CHARLES GRAINGE,  
KRISTINA KHORRAM,  
CHALICE RECORDING STUDIOS,  
LOVE RECORDS,  
MOTOWN RECORDS,  
UNIVERSAL MUSIC GROUP,  
COMBS GLOBAL ENTERPRISES,  
JOHN and JANE DOES 1-10 and  
ABC CORPORATIONS. 1-  
10

Defendants.

Case Number: 24-1457

DECLARATION OF  
ETHIOPIA HABTEMARIAM

I, Ethiopia Habtemariam, declare according to 28 U.S.C. §1746 as follows:

1. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and, if called upon to testify as a witness, I could and would competently testify thereto.

***Employment History with UMG:***

2. I began my employment with Universal Music Publishing Group (“UMPG”) in January 2003.
3. In or around February 2014, I was promoted to President of Urban Music/Co-Head of Creative at UMPG.
4. In or around February 2014, I was also given the titles of President of Motown Records and Executive Vice President of Capitol Music Group. In those roles, I reported directly to Steve Barnett.

5. In or around March 2021, I became the Chairwoman & CEO of Motown Records. At that time, Motown Records became a standalone label within UMG Recordings, Inc. (“UMG”). In that role, I reported directly to Lucian Grange.
6. I left Motown Records and the entire UMG organization in November 2022.

***Love Records:***

7. In or around May 2022, Motown Records entered into an agreement with Love Records, Inc. whereby Motown Records obtained the right to distribute one album being produced by Love Records, Inc. entitled *The Love Album*. UMG was aware of and authorized Motown Records to enter into a license agreement with Love Records.
8. To the best of my recollection, under the license agreement, Motown Records agreed to pay (or reimburse) Love Records for certain of the invoiced recording costs incurred by Love Records in making *The Love Album*.
9. I am not personally aware of any financial sponsorship by Motown Records or UMG of any Love Records listening parties or writers camps. To my knowledge, neither Motown Records nor UMG would have organized or run any listening parties or writers camps for *The Love Album* while I was at Motown.
10. I am not personally aware of any cash payments from Motown Records or UMG to Love Records or Mr. Combs. Instead, as I said, to the best of my recollection, under the license agreement, Motown Records would have paid or reimbursed Love Records only for certain invoiced recording costs.
11. Since leaving Motown Records in November 2022, I have had no involvement with Love Records.

I declare under penalty of perjury that the preceding is true and correct.

Executed on March 21, 2024

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Ethiopia Habtemariam